

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

RECEIVED

APR 8 1996

FEDERAL BUREAU OF INVESTIGATION  
DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL

In the Matter of

)

CC Docket No. 96-23

)

Revision of

)

Filing Requirements

)

DOCKET FILE COPY ORIGINAL

COMMENTS

Gregory L. Cannon  
Suite 700  
1020 19th Street, N.W.  
Washington, DC 20036  
(303) 672-2765

Attorney for

U S WEST COMMUNICATIONS, INC.

Of Counsel,  
Dan L. Poole

April 8, 1996

No. of Copies rec'd  
List ABCDE

026

## TABLE OF CONTENTS

	<u>Page</u>
SUMMARY.....	ii
I. U S WEST SUPPORTS THE COMMISSION'S ELIMINATION OF UNNECESSARY DIVESTITURE-RELATED REPORTS.....	2
II. U S WEST SUPPORTS THE ELIMINATION OF OTHER NON- ESSENTIAL AND UNNECESSARY REPORTS WHICH ARE CURRENTLY REQUIRED .....	3
III. U S WEST SUPPORTS THE COMMISSION'S PROPOSALS TO REDUCE THE FILING FREQUENCY FOR CERTAIN REPORTS .....	6
IV. U S WEST PROPOSES THAT THE COMMISSION ALSO ELIMINATE OR REDUCE THE REPORTING FREQUENCY FOR OTHER REPORTS WHICH ARE CURRENTLY REQUIRED .....	10
A. All ARMIS Reports Are Required To Be Filed Annually Under The Provisions Of The Telecommunications Act Of 1996 .....	11
B. The Commission Should Also Review The Filing Requirements For A Number Of Reports Related To Open Network Architecture ("ONA") .....	11
V. CONCLUSION .....	19

## SUMMARY

Under the auspice of the President's Regulatory Reform Initiative, the Commission has recommended eliminating or reducing the filing frequency of a number of currently required reports. U S WEST strongly supports this action and applauds the Commission for moving swiftly to eliminate unnecessary reporting by telecommunications carriers. U S WEST implores the Commission to go even further and eliminate additional unnecessary and non-essential reporting requirements and reduce the filing frequency of other reports. U S WEST also urges the Commission to attach sunset provisions to reporting requirements, automatically eliminating the requirements after an express period of time, unless extended for good cause.

As the telecommunications industry moves forward in the dawn of a fully competitive era, it is important that prior regulatory paradigms transition, as well. The regulations and reporting requirements previously considered necessary in a monopoly environment have no place in the future. The Commission has previously shown its leadership through the recognition of the changes taking place and its willingness to adapt its regulatory approach to those changes (e.g., Price Cap regulation). The Commission can continue to demonstrate such leadership by moving quickly to eliminate or reduce regulatory requirements and barriers which serve only to impede the transition to a fully competitive marketplace. The action taken in this docket is an important step in that direction.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	CC Docket No. 96-23
Revision of	)	
Filing Requirements	)	

**COMMENTS**

U S WEST Communications, Inc. ("U S WEST"), through counsel and pursuant to the Federal Communications Commission's ("Commission") Notice of Proposed Rulemaking in the above-captioned action,<sup>1</sup> files these comments in support of the Commission's initiative to eliminate and modify the reporting requirements for carriers. U S WEST applauds the Commission for the actions it has taken thus far in this docket and requests that the Commission go even further by eliminating additional unnecessary and non-essential reporting requirements and by reducing the filing frequency of other reports. The actions taken herein demonstrate an important transition for regulatory oversight which must take place in light of changing markets and competitive dynamics. The regulations and reporting requirements which were previously considered necessary in a monopoly environment have become outdated and overly burdensome. The Commission has shown its leadership through its recognition of the changes taking place and its willing-

---

<sup>1</sup> In the Matter of Revision of Filing Requirements, CC Docket No. 96-23, Notice of Proposed Rulemaking, FCC 96-64, rel. Feb. 27, 1996 ("NPRM").

ness to adapt its regulatory paradigms to respond to those changes. Continued diligence toward that end will provide the balance necessary to ensure the future expansion of the telecommunications marketplace, while maintaining support for the important public policy objectives of the Commission.

I. U S WEST SUPPORTS THE COMMISSION'S ELIMINATION  
OF UNNECESSARY DIVESTITURE-RELATED REPORTS

The Commission has proposed to eliminate several divestiture-related reports.<sup>2</sup> These reports are as follows: Equal Access Progress Report, Construction Budget Summary, and National Security and Emergency Preparedness Effectiveness. These reports have long since exceeded any usefulness they may have had at the time they were created. U S WEST fully supports their elimination.

The Equal Access Progress Report was initially established to track the individual Regional Bell Operating Companies' ("RBOC") progress in implementing equal access in their territories. This report no longer serves any useful purpose as the substantial majority of telephone customers nationwide now enjoy equal access. As shown by the report filed by U S WEST on March 1, 1996, for 1995, only three switches in the entire U S WEST region are not capable of providing equal access.<sup>3</sup>

---

<sup>2</sup> Id. ¶ 3.

<sup>3</sup> To add some perspective, U S WEST had a total of 1,737 switches in 1994. As for the three remaining switches, one in rural Arizona and two in rural Utah, these three exchanges are currently the subject of pending sales.

The filing of this report to note minute changes in the number of switches converted to equal access is purposeless and should be eliminated.

The Construction Budget Summary and National Security and Emergency Preparedness Effectiveness Reports were also created at the time of divestiture. These reports were developed to ensure that the Commission had timely and relevant information on these areas during the period of divestiture-related transition. That period has certainly elapsed after twelve years. The usefulness of the information contained in these reports does not support the time and effort it takes to produce them. The Commission should also eliminate these reporting requirements.

## II. U S WEST SUPPORTS THE ELIMINATION OF OTHER NON-ESSENTIAL AND UNNECESSARY REPORTS WHICH ARE CURRENTLY REQUIRED

The Commission also proposes to eliminate the filing requirement for additional non-divestiture-related reports. As noted by the Commission in its NPRM, many of these reports were originally developed to serve an oversight purpose for which no actual issues or problems have ever developed.<sup>4</sup> As these reports have been shown to be unnecessary, they should be eliminated. These instances should also provide the Commission with some insight for the establishment of future reporting requirements. To the extent that the Commission perceives an initial need for carrier reporting, it should include a sunset provision which would automatically eliminate the reporting requirement after a period of time unless expressly ex-

---

<sup>4</sup> See NPRM generally.

tended by the Commission. This would reduce the need for future proceedings such as this one to eliminate non-essential and unnecessary reporting requirements.

The first report relevant to U S WEST in this section of non-divestiture related reports is the BOC [Bell Operating Company] Customer Premises Equipment (CPE) Installation and Maintenance Report and/or BOC Customer Premises Equipment Affidavits for Non-Discriminatory Provision of Network Maintenance. As noted by the Commission, this report/affidavit was initiated to monitor “whether the BOCs are discriminating against unaffiliated customer premises equipment vendors with respect to installation and maintenance.”<sup>5</sup> Also noted by the Commission, it has received no formal complaints from any party alleging unlawful practices in the provision of installation and maintenance services in the eight years since the inception of this report.<sup>6</sup> U S WEST knows of no CPE installation- or maintenance-related issues which have occurred in its region. This should provide ample evidence that the basis for this report has never materialized and that this non-issue requires no further oversight by the Commission. This is also an area where the Commission’s existing rules and complaint process are certainly adequate to deal with any problem in the future. The required report/affidavit provides no additional value to the Commission and no further submissions should be required.

---

<sup>5</sup> Id. ¶ 7.

<sup>6</sup> Id. ¶ 8.

As for the BOC Sales Agency Program and Vendor Support Program Reports, U S WEST concurs with the Commission's conclusion that these reports "may not as a practical matter serve the purposes for which they were intended."<sup>7</sup> While the Commission's original purpose for requiring these reports was to ensure that CPE vendors had meaningful opportunities for joint marketing, U S WEST can find no evidence that the issue originally identified has ever become a problem. Furthermore, as noted by the Commission, U S WEST can find no evidence that independent CPE vendors continue to use and have any legitimate need for such a report. This report can be eliminated.

The Billing and Collection Contracts Report demonstrates another area where the conditions which existed at the inception of the reporting requirement have long since disappeared. No longer do other carriers or service providers depend exclusively on the BOCs to provide billing and collection services. Many now self provide or use other competitive services for these purposes. In an effort to control the access to customer billing information, many interexchange carriers ("IXC") are moving away from BOC-supplied billing and collection. This trend is likely to accelerate in the near future as the BOCs and the IXCs begin competing in both local and long distance markets. Many large IXCs already perform their own message rating and recording functions. Other carriers also have multiple alternative sources for these services. The information supplied by this report is of little or no value on a going-forward basis. The Commission acknowledges that this report is

---

<sup>7</sup> Id. ¶ 9.



“seldom used by the staff or the public” and proposes its elimination.<sup>8</sup> U S WEST concurs with this recommendation.

The Report on Inside Wiring Services requires that local exchange carriers (“LEC”) with annual revenues of \$100 million or more provide to the Commission “a copy of any state or local statute, rule, order, or other document that regulates, or proposes to regulate, the price or prices the local exchange carrier charges for inside wiring services.”<sup>9</sup> As the installation of inside telephone wiring is deregulated and competitive in most states, the need for this report is not apparent from a reading of the rule or the Commission’s explanation in the NPRM. If necessary, there are certainly other resources for the collection of all state statutes or rules which impact the provision of inside wiring (e.g., Westlaw and LEXIS databases). U S WEST sees no value or purpose in requiring the LECs to continue to provide this information to the Commission.

### III. U S WEST SUPPORTS THE COMMISSION’S PROPOSALS TO REDUCE THE FILING FREQUENCY FOR CERTAIN REPORTS

In its NPRM, the Commission proposes to reduce the filing frequency of a number of required reports.<sup>10</sup> The Commission notes that while these reports still serve an important purpose, there is no need for them to be filed as frequently as

---

<sup>8</sup> Id. ¶ 10.

<sup>9</sup> 47 CFR § 43.41.

<sup>10</sup> NPRM ¶ 2.

currently required. U S WEST again commends the Commission for its initiative to reduce the frequency of a number of required reports. This action again demonstrates the Commission's flexibility to respond to changing marketplace conditions.

The Commission first addresses the frequency requirements for the ARMIS Service Quality Report 43-05. Although it initially proposed to reduce the filing requirement to semi-annually in the NPRM,<sup>11</sup> the Commission has correctly acknowledged in its subsequent Implementation Order<sup>12</sup> that the Telecommunications Act of 1996 ("1996 Act") requires that such filings be made on an annual basis.<sup>13</sup> The Commission has so ordered consistent with the language of the 1996 Act.

While not related to reporting frequency, there are other issues currently pending before the Commission regarding this report. U S WEST previously filed with the Commission on November 12, 1993, a Petition for Reconsideration and Clarification requesting clarification and, to the extent necessary, modification to the Commission's methodology by which service quality data are compiled and reported.<sup>14</sup> The Commission should also act on this previous request concerning the ARMIS 43-05 Report.

---

<sup>11</sup> Id. ¶ 15.

<sup>12</sup> In the Matter of Revision of Filing Requirements and Implementation of Section 402(b)(2)(B) of the Telecommunications Act of 1996: Annual ARMIS Reports, CC Docket No. 96-23, Order, DA 96-381, rel. Mar. 20, 1996 ("Implementation Order").

<sup>13</sup> The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 129 § 402(b)(2)(B) (1996).

<sup>14</sup> See U S WEST's Petition for Reconsideration and Clarification, filed Nov. 12, 1993, CC Docket No. 87-313.

As noted in the NPRM, the Joint Board Monitoring Program - Pooling Report is submitted by the National Exchange Carrier Association (“NECA”) on a monthly (summary of pool results) and annual (long-term support) basis under the Commission’s current rules. The Commission has proposed to reduce the filing frequency of this report to quarterly.<sup>15</sup> U S WEST agrees with the Commission.

On a related matter, U S WEST currently completes annually the “Network Usage Data Request” as requested by NECA. This is the information which underlies the annual Joint Board Monitoring Report (CC Docket No. 87-339). The Network Usage Data Request provides NECA, at the Study Area level, the Interstate Transitional Subscriber Plant Factor (“SPF”), unweighted Local Dial Equipment Minutes (“DEM”), Unweighted State Toll DEM, Unweighted Interstate DEM, the Unweighted Interstate DEM Factor, and the Transitional Interstate DEM Factor. Most of this data is available or can be easily calculated by using the data found in the ARMIS 43-04 Report. The single exception is State Toll DEM. To the extent required, this information could be added to the data required in the ARMIS 43-04 Report. This “Network Usage Data Request” is redundant, and the Commission should act to eliminate this report for ARMIS 43-04 reporting companies.

The Commission has also proposed reducing the frequency from quarterly to annually of the New Service Tracking Report.<sup>16</sup> U S WEST previously supported

---

<sup>15</sup> NPRM ¶ 17.

<sup>16</sup> Id. ¶ 18.

such a proposal by the Commission in CC Docket No. 92-275.<sup>17</sup> U S WEST reiterated this support in its comments on the Second Further Notice in CC Docket No. 94-1.<sup>18</sup> In the instant NPRM, the Commission acknowledges that the staff needs the information required in the report only on an annual basis.<sup>19</sup> This should be sufficient justification as the Commission staff is the primary user of this information.<sup>20</sup> Compiling the data for this report is extremely time consuming for U S WEST, as the information required must come from a variety of different sources. U S WEST supports the Commission's proposal that this report be filed on an annual basis.

The Commission also requests comment on a reduction of the filing requirements for the Report of Unsecured Credit to Political Candidates required by the Federal Election Campaign Act of 1971 ("Campaign Act of 1971").<sup>21</sup> The Commission has proposed reducing the filing requirement for this report to annually. U S WEST supports this change. To the extent that carriers have provided unse-

---

<sup>17</sup> See Reply Comments of U S WEST Communications, Inc., filed Apr. 13, 1993, CC Docket No. 92-275.

<sup>18</sup> In the Matter of Price Cap Performance Review for Local Exchange Carriers, Treatment of Operator Services Under Price Cap Regulation, Revisions to Price Cap Rules for AT&T, CC Docket Nos. 94-1, 93-124, 93-197, Second Further Notice of Proposed Rulemaking in CC Docket No. 94-1, Further Notice of Proposed Rulemaking in CC Docket No. 93-124, and Second Further Notice of Proposed Rulemaking in CC Docket No. 93-197, FCC 95-393, rel. Sep. 20, 1995 ("Second Further Notice"). See Comments of U S WEST Communications, Inc., filed Dec. 11, 1995, CC Docket Nos. 94-1, et al. at 8 n.9.

<sup>19</sup> NPRM ¶ 18.

<sup>20</sup> As the information in this report is also contained in the New Services list required to be filed with U S WEST's Annual Access Tariff filing, the Commission may want to review the necessity for this report altogether.

<sup>21</sup> NPRM ¶ 20. And see Pub. L. No. 92-225, § 401, 86 Stat. 3 (1972).

cured credit to federal political candidates, annual reporting appears to be sufficient to carry out the presumed intention of this particular provision of the Campaign Act of 1971; that is, to provide public information and oversight of any such activities. More frequent reporting would not appear to provide significant additional benefit. As the particular language of the law does not limit the Commission in maintaining its own rules with respect to issues therein, U S WEST would support a reduced filing requirement for this report.<sup>22</sup>

#### IV. U S WEST PROPOSES THAT THE COMMISSION ALSO ELIMINATE OR REDUCE THE REPORTING FREQUENCY FOR OTHER REPORTS WHICH ARE CURRENTLY REQUIRED

As stated previously, U S WEST fully supports the Commission's efforts to reduce or eliminate reporting requirements for regulated carriers. However, U S WEST believes that the Commission should go further by eliminating additional unnecessary and non-essential reporting requirements and by modifying the filing frequency of other reports. Below, U S WEST lists additional reports for the Commission's consideration and proposes specific action regarding each report.

---

<sup>22</sup> "Section 451. Extension of credit by regulated industries; regulations

"The Secretary of Transportation, the Federal Communications Commission, and the Surface Transportation Board shall each maintain[,] its own regulations with respect to the extension of credit, without security, by any person regulated by such Secretary under subpart II of part A of subtitle VII of title 49, United States Code [49 USCS §§ 41101 et seq.], or such Commission or Board, to any candidate for Federal office, or to any person on behalf of such a candidate, for goods furnished or services rendered in connection with the campaign of such candidate for nomination for election, or election, to such office." 2 USC § 451.

A. All ARMIS Reports Are Required To Be Filed Annually Under The Provisions Of The Telecommunications Act Of 1996

Although the Commission has only specifically listed the ARMIS 43-05 Report in this docket, it has acknowledged in the Implementation Order that the 1996 Act requires the Commission to permit common carriers to file all ARMIS reports, including 43-01 and 43-06, on an annual basis.<sup>23</sup> It further stated that “[a]t a later date, the Bureau will provide further guidance on necessary changes to form and content of the ARMIS quality of service report, and other ARMIS reports, in light of the Telecommunications Act of 1996.”<sup>24</sup> The Commission should consider those issues concurrently with this docket in the interest of time and resources. The 1996 Act is clear and specific on this point. While the Commission may later choose to modify the content of those reports, it should act now to reduce the filing requirement consistent with the statutory provisions of the 1996 Act.

B. The Commission Should Also Review The Filing Requirements For A Number Of Reports Related To Open Network Architecture (“ONA”)

The Commission’s implementation of ONA also imposed a significant number of reporting requirements for common carriers. Here again, at the time of implementation the Commission was concerned about many issues regarding this new regulatory structure and the competitive impacts the ONA rules would have. It has

---

<sup>23</sup> Implementation Order ¶¶ 3-4, discussing the application of § 402(b)(2)(B) of the 1996 Act.

<sup>24</sup> Id. ¶ 5.

now been 10 years since the inception of ONA.<sup>25</sup> The Commission has had significant opportunity to review the process both through various proceedings and through the carriers' submissions of detailed ONA reports. As has been the case with other issues, and based upon the record evidence, the Commission can conclude that many of its initial concerns have not materialized. The Commission can therefore also modify the filing requirements for ONA reports as it has proposed in other areas. Below, U S WEST provides a list of current ONA reports and proposed filing requirement modifications for the Commission's consideration.<sup>26</sup>

#### Semi-Annual Report:

The Commission required each BOC to do the following by March 31, 1992, and requires the same information be filed every six months (U S WEST's most recent report was filed on March 29, 1996):<sup>27</sup>

- (1) Work through the Information Industry Liaison Committee ("IILC") to develop one consolidated nationwide matrix of BOC ONA services and state and federal ONA tariffs, and file the matrix with the Commission.
- (2) File computer diskettes and print-outs of data regarding state and federal tariffs.

---

<sup>25</sup> In the Matters of: Amendment of Sections 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry); and Policy and Rules Concerning Rates for Competitive Common Carrier Services and Facilities Authorizations Thereof; Communications Protocols under Section 64.702 of the Commission's Rules and Regulations, Report and Order, 104 FCC 2d 958 (1986).

<sup>26</sup> By this filing, U S WEST is not proposing to make any changes to the current ONA non-structural safeguards, only to some of the overly-burdensome ONA reporting requirements.

<sup>27</sup> In the Matter of Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order, 6 FCC Rcd. 7646 (1991) ("BOC ONA Further Amendment Order").

- (3) File a printed copy and computer diskette of the ONA Services User Guide. Diskettes are currently filed directly with the Common Carrier Bureau ("CCB") Policy Division.
- (4) File updated information contained in Appendix A of the January 31, 1991 Cross Reference Guide on ESP requests received and how they were addressed by the BOCs with details and matrices.
- (5) File updated information contained in Appendix B of the January 31, 1991 Cross Reference Guide on BOC responses to the requests and matrix.

U S WEST recommends that the Commission eliminate the filing of all paper documents relating to the ONA Services User Guide, Appendices A and B of the 1/31/91 Cross-Reference Guide, and the National Tariff Reference Matrix. The ONA Services User Guide will continue to be updated by the IILC on a semi-annual basis and available through the IILC and the BOCs. The BOCs will file a diskette copy of the User Guide with the CCB Policy Division as a part of the Annual ONA Report on April 15 of each year. The information currently contained in Appendices A and B of the 1/31/91 Cross-Reference Guide would be handled by the IILC as described below.

Annual Report:

The Commission requires each BOC to report on the following, initially by April 15, 1992, and on or before April 15 annually thereafter:<sup>28</sup>

- (1) Annual projected deployment schedules for its ONA services by type of ONA service (BSA, BSE, CNS, or ANS) in terms of percentage of access

---

<sup>28</sup> Id. at 7649 n.8, 7677-79, Appendix B.



lines served system-wide and by market-area. The April 15, 1992, report should cover the years beginning July 1, 1993, 1994, and 1995. Subsequent reports should cover the three year period for the three corresponding years.

All existing BSAs, BSEs, and CNSs will continue to be demonstrated in the annual filing in the ONA Services User Guide as discussed above. As the information contained in this report is now stable and duplicative of information filed in other ONA-related reports, the Commission should move to make the April 1996 filing the last required filing for this report.

- (2) New ONA service requests from ESPs and their disposition, and disposition of ONA service requests that have previously been designated for further evaluation.

U S WEST recommends that carriers continue reporting annually on the disposition of new ONA service requests.

- (3) Those ONA service requests previously deemed technically infeasible, and their disposition.

U S WEST believes that all technically infeasible requests that are not currently resolved by any BOC could be summarized and presented to the IILC. If there is interest by the ESP community, this might result in the development of one or more issues in the IILC. The IILC issue and 120-day-request processes are both available to all interested ESPs for both national and regional requests, respectively.

- (4) SS7, ISDN, and IN projected deployment in terms of percentage access lines served system-wide and on a market-area basis. SS7 data should be reported by TR 317 and TR 394, ISDN data by BRI and PRI, and IN data by release number or other designation by type.

For this report, U S WEST believes that the IILC could create an informational issue to determine if equivalent information is available via another report, e.g., the annual infrastructure report. The IILC could compare and contrast all other report(s) information and provide its findings to the Commission for its review. If this information is available in another report, and acceptable to the Commission, the Commission should move to relieve the BOCs of this reporting requirement.

- (5) New ONA services available though SS7, ISDN and IN, and plans to provide these services.

See U S WEST's response to item 2 above. As this item is duplicative, the Commission should move to make the April 1996 filing the last required filing for this report.

- (6) Progress on the efforts in the IILC on continuing activities for the implementation of service-specific and long-term uniformity issues.

The annual IILC Report Card is normally available at the second quarter IILC meeting each year. This Report Card is also available in the minutes from these meetings to all subscribers of the ATSI-generated document. The IILC will continue to require this Report Card for as long as the IILC views this document as a value to the ESP community. Since this information is made available by the

IILC on a voluntary basis, the Commission should move to make the April 1996 filing the last required filing for this report.

- (7) Progress in providing billing information including BNA, line-side CNI or possible CNI alternatives, and call detail services to ESPs.

All BOC information regarding BNA, CNI, and call detail services have matured and the information is stable. The IILC has had six issues regarding these topics: 001 - Uniform Delivery of Calling Number Identification ("CNI"); 015 - Information and Delivery Mechanisms for ESP Billing; 017 - Uniform Delivery of Line Side CNI in the Near Future; 018 - Ability to Control CNI Delivery; 024 - Calling Party Identification ("CPID") Anonymity Privacy; and 041 - Delivery of Billing Information and Called Number to ESPs Utilizing Non-Access Dialing Plan. Any new IILC issues and all Commission reporting on these topics would result in a summary of the same information with minor updates. The Commission should move to make the April 1996 filing the last required filing for this report.

- (8) Progress in developing and implementing OSS services and ESP access to those services.

The information in this report has also matured and is stable. ESPs have not requested OSS capabilities for access services via either the IILC or the 120-day process for several years. Several IILC issues: 003 - ESP/Customer Access to RBOC Network Management Systems; 039 - ESP Needs for OSS Capabilities Associated with End-User Complementary Network Services; and 051- Procedures for Access to

OSSs in a Multi-Provider Environment, address the ESP access to OSS in complete detail. In addition to this mandated Commission item, the BOC members of the IILC have been providing, and continue to provide, via handout to the IILC members and in the IILC minutes, an annual OSS Matrix demonstrating currently available, planned, and future OSS functionality. The IILC will continue to require the OSS Matrix for as long as the IILC views this document as a value to the ESP community. The Commission should accept the IILC report as the replacement for this mandated item and move to make the April 1996 filing the last required filing for this report.

(9) Progress on the uniform provision of OSS Services.

U S WEST believes that the majority of this report concerns standards efforts in ANSI T1 standards bodies and OSS issue work being accomplished in the IILC. The work accomplished in these bodies is national in scope and publicly available. Therefore, the Commission should move to make the April 1996 filing the last required filing for this report.

(10) List of BSEs used in the provision of BOCs' own enhanced services.

Deployment of BSEs, and the related BSAs, has matured for all of the BOCs. The agenda for all IILC meetings includes a report from the TAG chairperson on any new ONA basic services made available by any BOC; also, this information will continue to be available in the ONA Services User Guide. Currently, all CEI plans

filed by the BOCs also contain this same information. The Commission should move to make the April 1996 filing the last required filing for this report.

New Technologies Report:

This information has been filed as a part of the 4/15 Annual Report. The Commission in its Memorandum Opinion and Order in CC Docket No. 88-2, released March 29, 1993, required the BOCs to “report annually on unbundling of new technologies arising from their own initiative, in response to requests by ESPs, or resulting from requirements imposed by the Commission.”<sup>29</sup>

Due to the interconnection provisions of the 1996 Act and the existence of competitive providers in most major markets, significant pressure now exists for industry movement toward what is technically feasible and competitively necessary to be unbundled in evolving technologies. Questions regarding safeguards will be driven by the type and quality of communication services requested and offered by competing LECs’ networks. Competition and demand will drive network unbundling faster and in many more directions than an annual report will be able to accurately forecast. The need for a report which details these rapidly evolving changes has been substantially eliminated. Reporting on new technology changes is an unnecessary requirement which will serve only to slow down their actual implemen-

---

<sup>29</sup> In the Matter of Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order, 8 FCC Rcd. 2606, 2608 ¶ 10 (1993).

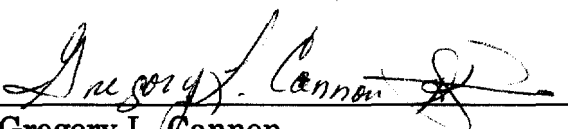
tation. The Commission should move to make the April 1996 filing the last required filing for this report.

V. CONCLUSION

Based upon the foregoing, U S WEST requests that the Commission move swiftly to eliminate or reduce the filing requirements for the previously specified reports. The actions taken herein represent an important step in the Commission's move toward adapting its regulatory approach to the changing telecommunications marketplace. U S WEST supports the Commission's continued diligence in this and other regulatory reform dockets.

Respectfully submitted,

U S WEST COMMUNICATIONS, INC.

By:   
Gregory L. Cannon  
Suite 700  
1020 19th Street, N.W.  
Washington, DC 20036  
(303) 672-2765

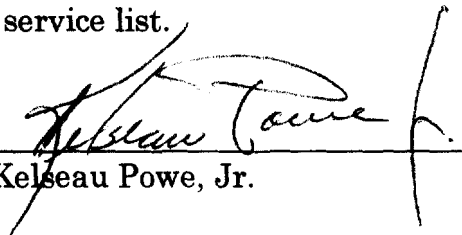
Its Attorney

Of Counsel,  
Dan L. Poole

April 8, 1996

## CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 8th day of April, 1996, I have caused a copy of the foregoing **COMMENTS** to be served via hand-delivery, upon the persons listed on the attached service list.



---

Kelseau Powe, Jr.

James H. Quello  
Federal Communications Commission  
Room 802  
1919 M Street, N.W.  
Washington, DC 20554

Reed E. Hundt  
Federal Communications Commission  
Room 814  
1919 M Street, N.W.  
Washington, DC 20554

Susan P. Ness  
Federal Communications Commission  
Room 832  
1919 M Street, N.W.  
Washington, DC 20554

Rachelle B. Chong  
Federal Communications Commission  
Room 844  
1919 M Street, N.W.  
Washington, DC 20554

Regina M. Keeney  
Federal Communications Commission  
Room 500  
1919 M Street, N.W.  
Washington, DC 20554

Nasir Khilji  
Federal Communications Commission  
Room 500-F  
2033 M Street, N.W.  
Washington, DC 20554

International Transcription  
Services, Inc.  
Room 246  
1919 M Street, N.W.  
Washington, DC 20554

(CC9623.GC/lh)  
Last Update: 4/4/96